

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION

IN THE MATTER OF A REQUEST FOR
CRIMINAL COMPLAINT

~~UNDER SEAL~~ ^{KK}

Case No. 2:23MJ 121

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Kevin W. Horne., being duly sworn, depose and state as follows:

1. Your affiant is a Postal Inspector assigned to the U. S. Postal Inspection Service (USPIS), Washington Division, Norfolk Domicile, Norfolk, Virginia. Your affiant has been employed by the U. S. Postal Inspection Service since June 2017 and currently investigate violations involving the US Mail and Identity Theft. Your affiant has been trained in fraud and mail theft investigations at the U.S. Postal Inspection Service Academy located in Potomac, Maryland. Your affiant received training and instruction on investigating federal crimes that use the U.S. Mail including but not limited to the sending of illegal drugs through the U.S. Mail, robbery and burglary of postal facilities, destruction of government property, theft of U.S. Mail, possession of stolen U.S. Mail, mail and bank fraud, identity theft, and counterfeit personal checks and identifications.
2. This affidavit is made in support of applications for a criminal complaint for Dominique Vaughn charging him with violations of Theft of U.S. Mail in violation of 18 U.S.C. § 1708, Theft of a U.S. Postal Key in violation of 18 U.S.C. § 1704, and Bank Fraud, in violation of 18 U.S.C. § 1344.
3. The facts in this affidavit come from my personal observations and information obtained from other investigators and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter. Rather, I have included only the facts that are sufficient to establish probable cause for the issuance of a criminal complaint charging Dominique Vaughn for the above-described criminal violations.
4. This investigation involves offenses within the jurisdiction and proper venue of the United States District Court for the Eastern District of Virginia, as more fully articulated below.

PROBABLE CAUSE

5. On Monday, October 24, 2022, a U.S. Postal Service Letter Carrier was accosted by an unknown black male wearing a hoodie. The suspect grabbed the U.S. Postal key from the letter carrier's hand and ripped the chain off the letter carrier's pants, tearing the belt loop of the letter carrier's waistband. As the suspect fled, the letter carrier witnessed him holding a handgun in the rear of his pants. A U.S. Postal key is a large

key with an engraved symbol on the front along with a serial number which is issued in a series which corresponds with specific zip codes. Each series of keys is capable of opening various types of mail receptacles in their specific areas including blue collection boxes and apartment panel mailboxes.

6. On or about, April 5, 2023, U.S. Postal Inspection Service Norfolk Domicile was notified about a break-in of blue collection boxes located at 3810 Indian River Rd, Chesapeake, VA 23325 on the mornings of April 4th and 5th, 2023. The suspect was accessing the blue collection boxes with an key / counterfeit key and stealing mail.
7. Prior to the break-in, a covert security camera was set up at to monitor the blue collection boxes at the Indian River Post Office which has an address of 3810 Indian River Rd., Chesapeake, Virginia 23325. Based on surveillance images, on or about Tuesday, April 4, 2023, at approximately 3:06 A.M., a unidentified male wearing a jacket is seen using a U.S. Postal key/counterfeit key to access two of three blue collection boxes and remove the mail contents and place them into a vehicle. The unidentified male then gets into the vehicle and leaves the area.
8. Based on surveillance images on or about Wednesday, April 5, 2023, at approximately 2:11 A.M., a unidentified male appears to be wearing the same jacket as the unidentified male on Tuesday is seen using a U.S. Postal key/counterfeit key to access one of three blue collection boxes and remove the mail contents and place them into a vehicle. The unknown male then gets into the vehicle and leaves the area. Based on surveillance images, at approximately 2:12 A.M, what appears to be the same unidentified male seen earlier, used a U.S. Postal key/counterfeit key to access all three blue collection boxes and remove the mail. The unidentified male then starts going through the mail at the blue collection boxes. Based on my experience, training and discussions with other law enforcement officers experienced in mail theft investigations, I know that individuals who are trying to access blue collection boxes illegally often are trying to steal postal customers checks and or money orders. The unidentified male then gets into the vehicle and leaves the area. One of the three blue collection boxes access door was left open.
9. Based on surveillance images at approximately 3:53 A.M, what appears to be the same unidentified male seen earlier, is trying to use a U.S. Postal key/counterfeit key to close the access door left open earlier. The unidentified male was unable to close it and leaves the area is a vehicle.
10. Based on surveillance images, on or about Friday, April 14, 2023, at approximately 2:05 A.M., an unidentified male is seen using a U.S. Postal key/counterfeit key to access all three blue collection boxes and remove the mail contents and place them into a vehicle. The unidentified male then gets into the vehicle and leaves the area.
11. Based on surveillance images, on or about Saturday, April 15, 2023, at approximately 3:18 A.M., an unidentified male is seen using a U.S. Postal key/counterfeit key to access two out of three blue collection boxes and remove the mail contents and place them into a vehicle. The unidentified male then gets into the vehicle and leaves the area.

12. The Inspection service was able to make some arrests of individuals breaking into other blue collection boxes in December of 2022. However, the key remained missing.
13. The blue collection boxes were broken into at the Indian River Post Office located at 3810 Indian River Rd, Chesapeake, VA 23325 on June 6, 2023. A Postal Inspector tracked the thief to a residence in Chesapeake, VA (the "Chesapeake Residence").
14. A Postal Inspector conducted surveillance at the Chesapeake Residence and was able to identify a vehicle parked out front. The plate of the vehicle was 1917LU. According to Virginia Department of Motor Vehicle records the Virginia tag 1917LU is registered to B.M. at a different address in Chesapeake. The registration was issued on 2/16/2023.
15. Law enforcement personnel conducted a database query regarding the name B.M. The database provided that B.M., is associated with the Chesapeake Residence.
16. Inspectors reviewed photos from the cameras capable of reading license plates and was able to identify at approximately 11:43 PM a dark color vehicle license plate 1917LU leaving the post office located at 3810 Indian River Rd, Chesapeake, VA 23325.
17. I have discovered that multiple checks stolen from the blue collection boxes were in the possession of the mail thieves and were deposited in financial institutions using mobile deposits. Mobile deposits occur when an individual takes a picture of the check using their cellular device and attaches it to an application which serves as a deposit mechanism into a particular bank account. This practice eliminates the risk of getting captured in person at a financial institution while committing the act of bank fraud. The mobile deposit allows for the fraudulent document to be negotiated without human interaction.
18. On June 8, 2023, USPIS applied for and received a search warrant from this Court for the Chesapeake Residence.
19. On June 9, 2023, USPIS and other law enforcement executed the search warrant. B.M. was there as well as the subject, Dominique Vaughn. USPIS seized numerous stolen items of mail and checks from the Chesapeake Residence, none of which were addressed or made out to B.M. or Dominique Vaughn. They also seized two notebooks with other people's Personally Identifiable Information. In addition, they seized a Texas driver's license with Dominique Vaughn's photograph but not his biographical information.
20. During the execution of the warrant, law enforcement provided *Miranda* warnings to Dominique Vaughn and attempted to interview him. Dominique Vaughn stated he needed money because he flushed drugs down the toilet when he saw USPIS there for the warrant. Dominique Vaughn offered to take USPIS to the stolen U.S. Postal key (which was not at the Chesapeake Residence) in return for a monetary reward. When he was told he would not be given a monetary award, Dominique Vaughn did not

provide any additional information about the stolen key and said he would rather “do his time.”

21. Dominique Vaughn is not the individual seen in the surveillance footage. However, Dominique Vaughn also stated that he allows others people to use B.M.’s car at night.

CONCLUSION

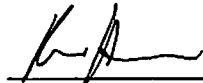
22. Based on the foregoing facts, I believe that there is sufficient probable cause to charge Dominique Vaughn with:

Count One: Theft of Mail- From at least on or about April 4, 2023, to on or about June 6, 2023, in the Eastern District of Virginia, Dominique Vaughn, did steal, take, or abstracts, or by fraud or deception did obtain, or attempted so to obtain, from or out of any mail post office, or station thereof, letter box, mail receptacle, or any mail route or other authorized depository for mail matter, a letter, postal card, package, bag, or mail, or abstract or remove from any such letter, package, bag, or mail, any article or thing contained therein, or secrete, embezzle, or destroy any such letter, postal card, package, bag, or mail, or any article or thing contained therein; or did steal, take, or abstract, or by fraud or deception obtain any letter, postal card, package, bag, or mail, or any article or thing contained therein which had been left for collection upon or adjacent to a collection box or other authorized depository of mail matter; and aid and abet the same, in violation of 18 U.S.C. §§ 1708 and 2, and

Count Two: Theft of Key- From at least on or about April 4, 2023, to on or about June 6, 2023, in the Eastern District of Virginia, Dominique Vaughn, did steal, purloin, embezzle, or obtain by false pretense any key suited to any lock adopted by the Post Office Department or the Postal Service and in use on any of the mails or bags thereof, or any key to any lock box, lock drawer, or other authorized receptacle for the deposit or delivery of mail matter, and aided and abetted the same, in violation of 18 U.S.C. §§ 1704 and 2.

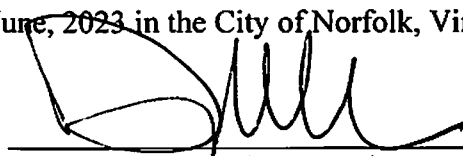
23. Accordingly, I request the issuance of a complaint.

FURTHER, YOUR AFFIANT SAYETH NAUGHT.



Kevin W. Horne
U.S. Postal Inspector

Subscribed to and sworn before me this 9th day of June, 2023 in the City of Norfolk, Virginia.



United States Magistrate Judge
Douglas E. Miller
United States Magistrate Judge